



CODE OF ETHICS AND CONDUCT

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Premises

This "Code of Ethics and Conduct" was adopted by the company A. Benevenuta & C. Spa and contains the enunciation of the general principles of legality, correctness, transparency and moral integrity which represent an essential prerequisite for carrying out the activities of Benevenuta S.p.A. and for the achievement of the economic, productive and social objectives that the company sets itself.

The corporate "Code of Ethics and Conduct", in particular, defines the rules of conduct in relations with:

- external interlocutors (customers, suppliers, consultants)
- collaborators
- market
- environment

The objective is to define the rules of organization and management of the entrepreneurial activity aimed at the creation of an efficient and effective system of planning, execution and control of the activities such as to ensure constant compliance with the rules of conduct and prevent their violation by of any person acting on behalf of the company.

Dissemination and update

The «Code of Ethics and Conduct» is widely distributed internally and is available to any interlocutor of the company.

Each employee of the company is required to know and comply with the provisions of the Code. The company carefully monitors compliance with the Code, providing adequate information, prevention and control tools and intervening, if necessary, with corrective actions.

This Code may also be amended and supplemented on the basis of suggestions and indications from the supervisory body or the Board of Statutory Auditors - with a resolution of the Board of Directors.

Field of application

The "Code of Ethics and Conduct" applies within the Italian plants of the company.

1. External behaviour

1.1. Competition

The corporate policy of Benevenuta is based on the principles of free and fair competition and all the actions taken in the exercise of the entrepreneurial activity are aimed, as per the Code of Ethics, at obtaining competitive results that reward ability, experience and efficiency.

The company and its collaborators must behave correctly in business affairs of corporate interest and in relations with all external companies.

Any action aimed at altering the conditions of fair competition is contrary to the company policy of the company and is prohibited to any person acting on its behalf.



In no case can the pursuit of corporate interest justify a conduct of the top management and / or employees and / or collaborators of the company that is not respectful of the laws in force and complies with the rules of this Code.

In any communication with the outside world, the information regarding the company and its activities must be truthful, clear and verifiable.

1.2. Confidentiality

The employee has a duty not to disclose confidential information relating to the company where he works according to the basis in article 2105 of the civil code, entitled "obligation of loyalty". The worker is prohibited from disclosing information relating to the company and its production methods or its customers (without specific authorization), or to use it in such a way as to harm or harm it.

By confidential information we mean:

- technical information (drawings, customer technical specifications or any technical document coming from outside), technological, financial, marketing, commercial or strategic, in the form of reports, communications also of an internal nature, studies, reports, lists, data, tables, cards, printouts and so on - both on paper and magnetic, optical or magneto-optical support - as long as they are identifiable and suitable for constituting a corporate utility asset.

1.3. Data protection and data security

As far as data protection and data security are concerned, "IT Policy" can be used as reference.

2. Relations

2.1. External interlocutors

The company's relations with any interlocutor, public or private, must be conducted in compliance with the law and in compliance with the principles of correctness, transparency and verifiability. No gifts or gratuities are allowed, in any form, that may even appear as exceeding normal commercial or courtesy practices, or in any case aimed at acquiring preferential treatment in the conduct of any business.

The company does not provide contributions, advantages or other benefits to political parties and workers' trade unions, nor to their representatives, except in compliance with the applicable legislation on the subject and in any case always in accordance with the general principle of transparency.

2.2. Customers

Benevenuta S.p.A. bases its business on the criterion of quality, essentially intended as the goal of fully satisfying customers and other subjects to whom the company's business is addressed.



In relations with customers and clients, the company ensures fairness and clarity in commercial negotiations and in the assumption of contractual obligations, as well as faithful and diligent contractual fulfilment.

All conduct, operations and business transactions decided or implemented by the company and / or by subjects acting in its name and on its behalf must comply with the law, professional correctness, principles of transparency, verifiability, consistency and congruity, as well as duly authorized, documented and registered.

In participating or launching tenders with customers or in the context of commercial and business negotiations, the company carefully evaluates the adequacy and feasibility of the requested services, with particular regard to the technical and economic conditions, promptly reporting where possible any anomalies.

The formulation of the offers will be such as to allow compliance with adequate quality standards, adequate remuneration levels for employees and current safety measures.

The company resorts to litigation only when its legitimate claims do not find due satisfaction in the interlocutor.

In conducting any negotiations, situations must always be avoided in which the subjects involved in the transactions are or may appear to be in conflict of interest.

2.3. Suppliers

Relations with the company's suppliers, including financial and consultancy contracts, are governed by the rules of this Code and are subject to constant and careful monitoring by the company itself.

The selection and selection processes of suppliers are based on principles of legality, correctness and transparency. The choice of the supplier is based on objective and impartial criteria in terms of quality, innovative level, cost, additional services with respect to the services / products offered. The violation of the principles of legality, correctness, transparency, confidentiality, and respect for the dignity of the person are just cause for termination of relations with suppliers. If the Recipients receive proposals for benefits from a supplier to favour their activity, they must immediately suspend the relationship and report the fact to the Employer.

The company makes use of suppliers, contractors or subcontractors, employment agencies that operate, as far as possible to verify by the same, in compliance with current legislation and the rules set out in this Code.

As regards the method of managing the confidentiality of data and technical information, the Supplier must comply with the safeguard clauses defined in the Civil Code and must not disclose such information without authorization according to the agreements stipulated between ATB and the Customer, unless otherwise specified.

The company requires its suppliers:

- to comply with labour laws and regulations in accordance with the regulations in force;
- to comply with the laws and regulations relating to the environment and safety in accordance with the regulations in force;
- not to discriminate against its own personnel based on race, nationality, sex and religion;
- not to resort to the exploitation of manpower in carrying out their activities



- minors or unwilling workers (forced labour);
- to read the “Code of Ethics and Conduct” and to undertake to respect it.

The company does not activate forms of collaboration with suppliers who do not accept these conditions and contractually reserves the right to adopt any suitable measure (including termination of the contract) in the event that the supplier, in carrying out activities in the name and / or for account of A. Benevenuta & C. Spa, violates the law, contract or the Code of Ethics and Conduct.

2.4. Environment

The company's production and commercial activities are managed in compliance with the applicable environmental legislation in force.

When it promotes, designs or entrusts the design of building interventions to third parties, the company carries out (or ensures that they are carried out) all the necessary investigations to verify the possible environmental risks deriving from the intervention and prevent damage.

2.5. Sustainability

The company has set up a sustainability plan according to the following principles:

- Environmental sustainability

ability to preserve the three functions of the environment over time:

- the function of resource provider
- the function of waste receptor
- the function of direct source of utility

- Economic sustainability

ability of an economic system to generate lasting growth of economic indicators. In particular, the ability to generate income and work for the sustenance of the company.

- Social sustainability

ability to guarantee conditions of human well-being (safety, health, education) equally distributed by class and by gender.

The mission is to guarantee an economic development compatible with social equity and ecosystems, thus operating in a regime of environmental balance, in compliance with the so-called balance rule of the three "E": Ecology, Equity, Economy.

The "social" conditions are regulated by the National Collective Labour Agreement for the private mechanical industry (CCNL) in force.

With regard to child labour, we make use of what is defined in the CCNL art. 6 sec. IV T.I. where it is clear that the work of minors and subjects entitled to compulsory employment is governed by the provisions of the law in force on the subject.



2.6. Collaborators

2.6.1. Job

The company recognizes the centrality of human resources, as the main success factor of any business activity, in a framework of mutual loyalty and trust between employer and employee.

All the staff employed by the company are hired with a regular employment contract.

The employment relationship is carried out in compliance with the collective contractual regulations of the sector and with social security, tax and insurance regulations.

The company promotes the continuous improvement of the professionalism of its employees, also by carrying out training initiatives.

The company undertakes, insofar as it is concretely possible, to ensure that all employees, managers, directors, collaborators, as well as the personnel and officers of other companies with which joint or coordinated activities should be carried out - even temporarily - observe constant compliance with the laws and regulations in force in all the countries in which the company operates, as well as the organizational and procedural rules adopted, in particular those expressly in the Code of Ethics, provided for in the organization, management and control model for the prevention of the commission of offenses.

2.6.2. Ethical principles in relations with personnel

The company promotes respect for the principles of equality and equal opportunities in personnel selection and recruitment activities, rejecting any form of favouritism, nepotism or cronyism.

Personnel assessment is carried out on the basis of the correspondence of the candidates' profiles with those expected and with company needs.

Employment relationships are formalized with a regular contract, refusing any form of irregular work.

As far as working hours are concerned, the provisions of the CCNL art. 5 sec. IV T.III. where it can be seen that the duration of the weekly timetable is 40 hours.

The company favours maximum collaboration and transparency towards the new employee, so that the latter has a clear awareness of the assignment assigned to him. In fact, when the collaboration begins, the employee or collaborator must receive exhaustive information regarding the characteristics of the duties and the function, the regulatory and remuneration elements and the regulations and behaviours for the management of risks connected to personal health. He must also explicitly accept his commitments deriving from this Code of Ethics.

The company favours working conditions that protect the psycho-physical integrity of people, providing workplaces that comply with current health and safety regulations. For this reason, it undertakes to promote and disseminate a culture of safety, developing awareness of risk management among its employees and collaborators, promoting responsible behaviour and implementing a series of actions, especially preventive ones, to preserve health and safety. and the safety of all staff.

The employee, on the other hand, must comply with all applicable laws and standards regarding safety and environmental protection and comply with the Company's policies in cases where these impose more stringent requirements than the legal standards.



Furthermore, the Company will be responsible for promoting the professional growth of collaborators through appropriate tools and training plans. The Company wants to be a workplace free from discrimination or harassment of a physical and / or psychological nature for its employees. Therefore, equal opportunities will be offered to all employees and those seeking employment at the company, in line with the applicable legal provisions, and harassment or conduct likely to create a hostile atmosphere in the workplace will not be tolerated.

The employee or collaborator who believes that he has been subjected to harassment or that he has been discriminated against for reasons related to sexuality, race, state of health, nationality, political opinions, religious beliefs, or any other reason not justified on the basis of objective or reasonable criteria, he can report the incident to the Employer who will carefully evaluate the actual violation of this Code of Ethics and will communicate the results to the competent function. In the management of hierarchical relationships, company representatives undertake to ensure that authority is exercised with equity and correctness, avoiding any abuse.

It is an abuse of the position of authority to request, as an act due to the superior, services, personal favours and any behaviour that constitutes a violation of this code. The employee or collaborator must act loyally in order to comply with the obligations underwritten by his employment contract and by the provisions of this Code of Ethics, ensuring the services required of him.

All collaborators / employees are required to avoid situations that may give rise to conflicts of interest (for example joint interests with suppliers or customers) and to refrain from personally taking advantage of business opportunities that they have become aware of in the course of carrying out their duties. Each employee is required to work diligently to protect company assets as well as to prevent fraudulent or improper use, through responsible behaviour and in line with the objectives and operating rules set up to regulate their use, accurately documenting their use. It is forbidden to falsify, hold, spend or otherwise put into circulation banknotes, coins, public credit cards, counterfeit or altered revenue stamps.

2.6.3. Political forces and stakeholder associations

The company maintains relationships with trade associations, trade unions, similar organizations and associations, with the aim of developing their activities, establishing mutually beneficial forms of cooperation and presenting their positions.

The company may provide for sponsorships and contributions that may relate to social, political, cultural, sporting and artistic events and initiatives; they can also be aimed at carrying out studies, researches, conferences and seminars concerning topics of collective and / or specific interest for the Company.

2.6.4. Training and development

The company undertakes to make available to collaborators the knowledge, updating and professional improvement tools necessary for the performance of the related activities.

The company defines and implements a careful planning of training activities and we place all collaborators in the conditions to access them, according to opportunity and following a careful analysis of potential and needs.



Collaborators have a duty to contribute to this commitment, both by actively participating in training initiatives and by sharing and applying the contents learned.

The company values the contribution of everyone, guaranteeing equal opportunities for growth based on the evaluation of results and assigning responsibilities consistent with the role and paths of the individuals and enhancing the skills acquired.

The evaluation of the collaborators is carried out in an extensive manner involving the managers, the Human Resources function and, as far as possible, the subjects who have entered into a relationship with the evaluated, through systems that are fair, transparent and known to the evaluated collaborators.

The collaborators undertake to be participatory and proactive in the evaluation process.

2.6.5. Remuneration

Remuneration policies and choices are a fundamental element for the management of human resources. It is in fact a series of choices that are aimed at aligning the work of people with the strategic priorities of the company and with the objectives of the functional units to which they belong. Furthermore, beyond the purely economic aspects that obviously guide the actions of workers, the remuneration policy contributes significantly to transfer messages in relation to company strategy and policies both at the business level and at the personnel management level.

2.6.6. Health and Safety

The company guarantees working conditions that respect individual dignity and safe and healthy work environments, including temporary and mobile construction sites, in full compliance with current legislation on the prevention of accidents at work and the protection of workers.

The company carries out its business in technical, organizational and economic conditions such as to ensure adequate accident prevention and a healthy and safe working environment.

The company undertakes to spread and consolidate a culture of safety among all its collaborators, developing risk awareness and promoting responsible behaviour on the part of all collaborators.

3. Methods of implementation

3.1. Prevention

In compliance with current legislation and with a view to planning and managing company activities aimed at efficiency, correctness, transparency and quality, the company adopts organizational and management measures suitable to prevent illegal behaviour or in any case contrary to the rules of this Code by any person acting on its behalf.

Due to the articulation of the activities and the organizational complexity, the company adopts a system of delegation of powers and functions, providing in explicit and specific terms the assignment of tasks to people with suitable skills and competence.

In relation to the extension of the delegated powers, the company adopts and implements models of organization and management that provide suitable measures to ensure the performance of activities in compliance with the law and the rules of conduct of this Code, as well as to identify and promptly eliminate any risk situations.



3.2. Inspections

The company adopts specific methods of checking the compliance of the behaviour of anyone acting on its behalf with the provisions of current legislation and the rules of conduct of this Code.

3.3. Sanctions

Compliance by the employees of the company with the rules of the Code of Ethics must be considered an essential part of the contractual obligations.

The violation of the rules of the Code of Ethics by employees may constitute a breach of the primary obligations of the employment relationship or a disciplinary offense, with all legal consequences.

Date	Change	Description	Revision
30/04/2015	Emission		0
19/07/2017	Revision	Added par 2.5, updated par 2.6.2; 2.6.3; 2.6.4; 2.6.5	1
15/05/2023	Revision	Updated par. 2.6.2 "Working hours" Added par. 1.3 "Data protection and data security"	2

15/05/2023

Management